

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BELCALIS MARLENIS ALMÁNZAR,

Plaintiff,

v.

LATASHA TRANSRINA KEBE a/k/a
LATASHA TRANSRINA HOWARD and
STARMARIE EBONY JONES,

Defendants.

Case No. 1:19-cv-01301-WMR

JOINT MOTION FOR EXTENSION OF DEADLINES

Plaintiff Belcalis Marlenis Almánzar (“Plaintiff”) and Defendant Latasha Transrina Kebe (“Kebe”) respectfully submit this Joint Motion for Extension of Deadlines in this matter, and provide as follows:

1. On August 26, 2019, the parties filed their Joint Preliminary Report and Discovery Plan (the “Discovery Plan”) in this action. (ECF No. 17.) The parties have been operating pursuant to the Discovery Plan’s directives and deadlines.
2. Plaintiff propounded written demands on October 4, 2019, and Kebe served written responses in November of 2019 and certain responsive documents in

December of 2019. Kebe propounded written demands on February 9, 2020.

3. On April 9, 2020, the parties sought an extension of the case deadlines due to significant disruptions caused by the current pandemic.
4. This Court granted the parties' motion and extended the case deadlines as follows:
 - (a) the deadline for all parties to complete discovery and file discovery motions, including but not limited to motions to compel, was extended to June 30, 2020; and
 - (b) the deadline for the parties to file motions for summary judgment was extended to July 30, 2020.
5. Due to ongoing complications from the pandemic and some recent health issues faced by the parties and their counsel, the parties will be unable to complete discovery by the current deadline. In addition, the parties have discussed a possible resolution of this matter and wish to have additional time to explore settlement before burdening this Court with discovery motions.
6. Accordingly, the parties respectfully request the deadlines be extended as follows:
 - (a) the deadline for all parties to complete discovery and file discovery

motions, including but not limited to motions to compel, be extended to August 31, 2020; and

(b) the deadline for the parties to file motions for summary judgment be extended to September 30, 2020.

7. A proposed order has been submitted with this motion.

Dated: June 2, 2020

Respectfully submitted,

/s/ W. Andrew Pequignot
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CERTIFICATION AS TO FONT

In accordance with Local Rule 7.1(D), the undersigned certifies that the foregoing document was prepared with Times New Roman 14, a font and point selection approved by the Court in Local Rule 5.1(C).

DATED: June 2, 2020

/s/ W. Andrew Pequignot
W. Andrew Pequignot

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2020, I electronically filed the foregoing JOINT MOTION FOR EXTENSION OF DEADLINES with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to all of the attorneys of record.

/s/ W. Andrew Pequignot
W. Andrew Pequignot